

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

**In Re:** :  
**NORIS M FLORES,** : **Bankruptcy No. 22-10198-mdc**  
**Debtor** : **Chapter 13**  
**HSBC Bank USA, N.A., as Trustee for the registered** :  
**holders of First NLC Trust 2007-1 Mortgage-Backed**  
**Certificates, Series 2007-1** :  
**Movant** :  
 :  
**v.** :  
**NORIS M FLORES** : **11 U.S.C. §362**  
  
**and**  
**KENNETH E WEST, ESQUIRE (TRUSTEE)**

**Respondent(s)** :

**CERTIFICATION OF NO ANSWER REGARDING HSBC BANK USA, N.A., AS TRUSTEE FOR THE  
REGISTERED HOLDERS OF FIRST NLC TRUST 2007-1 MORTGAGE-BACKED CERTIFICATES,  
SERIES 2007-1'S  
MOTION FOR RELIEF FROM STAY (DE 41)**

The undersigned hereby certifies that, as of September 6, 2022, the undersigned has received no answer, objection or other responsive pleading to the Movant's Motion for Relief from Stay.

The undersigned further certifies that I have reviewed the Court's docket in this case and no answer, objection or other responsive pleading to the Movant's Motion for Relief from Stay. Pursuant to the Notice of Motion, objections to the Movant's Motion were to be filed and served before August 19, 2022.

It is hereby respectfully requested that the Order attached to the Motion be entered at the earliest convenience of the Court.

Dated: September 8, 2022

Respectfully submitted,

Brock & Scott, PLLC

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439

Matt Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

Attorney for Creditor

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**NORIS M FLORES** : **11 U.S.C. §362**  
  
**and**  
**KENNETH E WEST, ESQUIRE (TRUSTEE)**

**Respondent(s)** :

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing Certification of No Answer has been electronically served or mailed, postage prepaid on September 9, 2022 to the following:

NORIS M FLORES  
461 E ONTARIO ST  
PHILADELPHIA, PA 19134-1124

Michael A. Cibik, Debtor's Attorney  
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1500 Walnut St, Suite 900  
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mail@cibiklaw.com

KENNETH E WEST, Bankruptcy Trustee  
Office of the Chapter 13 Standing Trustee  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107

Office of United States Trustee, US Trustee  
Robert N.C. Nix Federal Building  
900 Market Street, Suite 320  
Philadelphia, PA 19107

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439

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